

3747 RF 93

DUE  
DATE

ACTION

DIST	LTR	ENC
BENEDETTI, R.L.		
BENJAMIN, A.		
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRANZ, W.A.		
HANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.	X	
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
MANN, H.P.		
MARX, G.E.		
MCKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
RILEY, J.H.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.	X	
SETLOCK, G.H.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		

Rising TX

Adm Rec X

CORRES CONTROL x x  
PATS/T130G

Reviewed for Addressee  
Corres. Control RFP

8-23-93  
DATE BY

Ref Ltr. #

DOE ORDER #

States Government

Department of Energy

# memorandum

AUG 23 7 45 AM '93

Rocky Flats Office

AUG 19 1993

WPD:JJR:09807

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

Rocky Flats Comments on the Notice of Proposed Rulemaking "Hazardous Waste Management System: Identification Hazardous Waste; Treatability Studies Sample Exclusion"

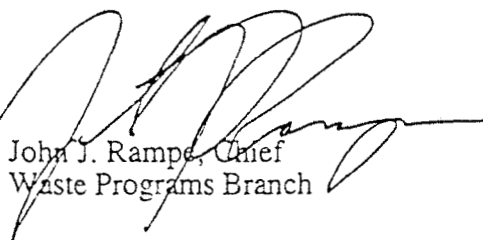
Katherine Nakata, RCRA/CERCLA Division, EH-231, HQ

We have completed a review of the subject proposed rulemaking, and find that the proposed increased quantity of soil and debris samples used in treatability studies exempt from full Resource Conservation and Recovery Act (RCRA) regulations, may prove to be most beneficial to clean up and environmental restoration at Rocky Flats. However, since the State of Colorado has authority for RCRA at Rocky Flats, implementation will be delayed until the final rule is codified into the State's regulations. Typically, Colorado takes one to two years to adopt new rules after final Federal rulemaking.

Rocky Flats is presently under a compliance order that involves developing several new waste treatment systems. We have several treatability study exemptions in place for demonstrating the efficacy of technologies proposed for these systems; therefore, this rulemaking has direct applicability to us. Specifically our comments are:

1. Increasing the quantities of actual waste material which may be processed during a pilot scale demonstration will enhance the probability of fielding a viable operating unit by providing the developers with more data and information from which to make decisions.
2. Better defined operating characteristics obtained during larger scale tests during the test and evaluation phase of technology development will, provide management with more reliable decision making information for final process selection, ultimately lowering process development and implementation costs.
3. The debris definition must be the same as in 268.2 of RCRA for these benefits to be realized. Some clarification on this point may be required.
4. Due to the strict safeguards in place at Rocky Flats and other Department of Energy facilities, the threat to human health and risk to the environment is minimal for the treatment of 10,000kg of soil, debris and most types of non-acute hazardous and mixed waste.

If you need additional information, please contact me at 303-966-6246 or Reginald Tyler at 303-966-5927.

  
John J. Rampe, Chief  
Waste Programs Branch

cc:  
P. Bubar, EM-323  
T. Lukow, WPD, RFO  
R. Tyler, RPB, RFO  
A. Schubert, EG&G  
T. Rising, EG&G

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE